

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

FUND LIQUIDATION HOLDINGS LLC, as  
assignee and successor-in-interest to FrontPoint  
Asian Event Driven Fund L.P., on behalf of itself  
and all others similarly situated,

Plaintiff,

v.

Docket No. 16-cv-05263 (AKH)

CITIBANK, N.A., BANK OF AMERICA, N.A.,  
JPMORGAN CHASE BANK, N.A., THE ROYAL  
BANK OF SCOTLAND PLC, UBS AG, BNP  
PARIBAS, S.A., OVERSEA-CHINESE BANKING  
CORPORATION LTD., DEUTSCHE BANK AG,  
CREDIT AGRICOLE CORPORATE AND  
INVESTMENT BANK, CREDIT SUISSE AG,  
STANDARD CHARTERED BANK, DBS BANK  
LTD., UNITED OVERSEAS BANK LIMITED,  
AUSTRALIA AND NEW ZEALAND BANKING  
GROUP, LTD., THE BANK OF TOKYO-  
MITSUBISHI UFJ, LTD., THE HONGKONG AND  
SHANGHAI BANKING CORPORATION  
LIMITED, AND JOHN DOES NOS. 1-50,

Defendants.

**DECLARATION OF MATTHEW J. PORPORA**

MATTHEW J. PORPORA declares as follows:

1. I am a partner of Sullivan & Cromwell LLP (“Sullivan & Cromwell”) located in New York, New York.
2. Defendants Barclays PLC, Barclays Bank PLC and Barclays Capital Inc. (collectively, “Barclays”) are represented by the law firms of Sullivan & Cromwell and Boies Schiller Flexner LLP (“Boies Schiller Flexner”) in the above-referenced action (the “Action”).

3. The following attorneys from Sullivan & Cromwell have appeared in the Action as counsel for Barclays: David H. Braff, Yvonne S. Quinn, Jeffrey T. Scott and Matthew J. Porpora.

4. Upon the Court's granting of the accompanying motion for withdrawal of appearance, Sullivan & Cromwell, including each of the above-listed attorneys, will cease representing Barclays in the Action.

5. Boies Schiller Flexner will continue to represent Barclays in the Action, and the withdrawal of the above-listed Sullivan & Cromwell attorneys will not prejudice Barclays.

6. Pursuant to the Court's October 4, 2018 order (Dkt. No. 302), Barclays has been dismissed from the Action. On December 26, 2018, however, plaintiff filed a motion for leave to file a fourth amended complaint (Dkt. No. 347), which purports to name Barclays as a defendant. Briefing on this motion concluded on February 8, 2019, with plaintiff's filing of a reply memorandum in support of its motion (Dkt. No. 364). Oral argument is scheduled for March 19, 2019. (Dkt. No. 362).

7. Neither Sullivan & Cromwell nor any of its attorneys is asserting a retaining or charging lien.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 13, 2019  
New York, New York

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/s/ Matthew J. Porpora  
Matthew J. Porpora